

**Commonwealth of Kentucky
Division for Air Quality**

EXECUTIVE SUMMARY

ON THE TITLE V PROPOSED PERMIT V-08-040

Title V, Operating

Cooper Standard Automotive

Mt Sterling, KY 40353

March 4, 2009

Elizabeth KM Carrier, Reviewer

SOURCE ID: 21-173-00030

AGENCY INTEREST: 39374

ACTIVITY: APE20080002

SOURCE DESCRIPTION:

On June 10, 2008 Cooper Standard Automotive Mt Sterling Plant (CSA) submitted an application for the renewal of their Title V/Synthetic Minor permit, V-03-041 R4. Supplemental information was received on August 5, September 4 and October 22nd, 2008 and the application was considered complete on November 17, 2008. CSA currently operates two (2) boilers with a total heat input capacity of 25.2 MMBtu/hr at their facility. The plant produces automotive reinforced rubber hose in various diameters, lengths, and shapes. The main raw materials involved in hose production are rubber and reinforcing yarn. Secondary raw materials include adhesive and lubricant. The processes involved in reinforced rubber hose production include the extrusion of rubber on the Knit/Spiral Hose Lines #1, #2, and #3, printer stations for the customer, adhesive application operations, rubber curing in the Autoclaves, and the hose finishing operations.

CSA has applied for the addition of a third natural gas boiler with heat input capacity of 12.6 MMBtu/hr. CSA will no longer be using the #2 fuel oil as a secondary fuel in any of the boilers. In the renewal application, CSA has updated the potential carbon disulfide (CS₂) emission calculation from the autoclaves based on stack test emissions from their Cooper Standard Automotive Bowling Green plant. Additionally in this process, the rubber extrusion operation precedes the autoclaves and the autoclaves can process no more than the rubber extruders produce. Potential carbon disulfide emission values were calculated using the maximum production rate from the rubber extruder.

Included in the renewal application, CSA has removed the trimethylbenzene and isophorone emissions from potentials because the EPA has deleted those factors from the submitted, industry-provided information prior to issuing AP-42 factors. CSA is a major source for Volatile Organic Compounds (VOCs). A majority of their VOCs come from the emission of carbon disulfide. CSA has also requested to change their permit status from a Title V/Synthetic Minor to a Title V, based on the revised emission calculations

CSA requests removal of the following items from their list of insignificant activities:

SN-18 and 19 Two cold cleaning degreasers (parts washers)

Multi-Layer Plastic Tubing Line 1 & 2

Hot air blower #1.

Conveyor.

Rubber Mill

PUBLIC AND AFFECTED STATE REVIEW:

On January 8, 2009, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Mt Sterling Advocate* in Mt. Sterling, Kentucky. The public comment period expired 30 days from the date of publication. No states are affected by this permit action.

Comments were received from Cooper Standard Automotive via email on January 6, 7, 20 and 21, 2009 and in writing February 16, 2009. Attachment B lists the comments received, the Division's response to each comment, and a detailed explanation of the changes made to the permit. Minor changes were made to the permit as a result of the comments received; however the Division has concluded that the proposed operation will comply with all air quality regulations and requirements. Therefore, the Division has made a final determination to issue a proposed permit. A final permit will be issued after the U.S. EPA's 45-day review.